

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

Case No. 3:24-cv-10108

GAVIN ROZZI,

Plaintiff,

v.

EFPTR, LLC, A NEW JERSEY LIMITED  
LIABILITY COMPANY D/B/A EASTERN  
FINANCIAL PARTNERS, ADAM CUDDYER,  
INDIVIDUALLY AND IN HIS CAPACITY AS  
AN OFFICER OF EFPTR, LLC, FRANK  
VENEZIO, INDIVIDUALLY AND IN HIS  
CAPACITY AS AN AGENT OF EFPTR, LLC,  
MICHAEL FROIO, INDIVIDUALLY AND IN  
HIS CAPACITY AS AN AGENT OF EFPTR,  
LLC, JOHN DOE TELEMARKETERS FROM  
(848)-213-9848 (FICTITIOUS), JOHN DOE  
TELEMARKETERS FROM (848)-236-0031  
(FICTITIOUS), ABC ENTITIES 1-10  
(FICTITIOUS),

Defendants.

# ORDER

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**UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO RESPOND TO COMPLAINT**

Defendant EFPTR, LLC ("EFPTR") hereby files this *unopposed* motion for an extension of time to respond to the Complaint, and states as follows:

1. On October 28, 2024, plaintiff Gavin Rozzi ("Plaintiff") filed his Complaint in this action.
2. On December 3, 2024, Plaintiff served EFPTR with the Complaint. Thus, EFPTR's response to the Complaint is currently due on or before December 24, 2024.
3. Undersigned counsel was just retained to represent EFPTR in this matter and

requires additional time to discuss the allegations and potential defenses to Plaintiff's claims with EFPTR.

4. Prior to filing this Motion, counsel for EFPTR conferred with Plaintiff who indicated he does not oppose a 21-day extension of time for EFPTR to respond to the Complaint.

**WHEREFORE**, EFPTR respectfully requests that the Court enter an Order: (a) granting this Motion and (b) extending the deadline for EFPTR to respond to the Complaint until January 14, 2025.

Dated: December 23, 2024.

DESOUZA LAW, P.A.  
3111 N. University Drive  
Suite 301  
Coral Springs, FL 33065  
Telephone: (954) 603-1340  
[dan@copycatlegal.com](mailto:dan@copycatlegal.com)

By: /s/ Daniel DeSouza, Esq.  
Daniel DeSouza, Esq.  
Florida Bar No.: 19291

**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

/s/ Daniel DeSouza

For good cause shown, the above request (Doc. No. 9) is hereby GRANTED. Daniel DeSouza

SO ORDERED this 26th day of December 2024.

*R. Singh*

RUKHSANAH L. SINGH, U.S.M.J.